



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AB:SSS  
F. #2016R02185

*271 Cadman Plaza East  
Brooklyn, New York 11201*

June 24, 2019

By Email and ECF

Anthony Ricco  
20 Vesey Street, Suite 400  
New York, New York 10007

Re: United States v. Donville Inniss  
Criminal Docket No. 18-134 (S-1)(KAM)

Dear Mr. Ricco:

In an abundance of caution, the government hereby discloses the following information that may be helpful to the defense. When interviewed during an internal investigation of ICBL, Ingrid Innes and Alex Tasker generally denied the allegations to auditors. Innes is represented by Ronald G. DeWaard, Esq., who can be contacted at (616) 336-6480. In addition, Roger Clarke has expressed that he believed that the defendant's political rivals were trying to frame him. The government does not concede that this is material information under Brady v. Maryland, 373 U.S. 83 (1963), and its progeny.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Sylvia Shweder  
Sylvia Shweder  
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cc: Clerk of the Court (KAM) (by ECF)